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September 15, 2020


Via ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ziskind, et al.*
18-cr-375-VSB

Dear Honorable Judge Broderick,

Application denied at this time. Counsel is advised that the Court is capable of holding an in-person sentencing on or about October 16, 2020. Counsel is requested to obtain and file a declaration under seal from a healthcare professional with knowledge of Defendant's wife's cancer treatment outlining her upcoming treatment, including dates for treatments and surgery. The declaration should be filed on or before October 1, 2020. In recognition that my request for a declaration is directed at third parties I am requesting the information rather than ordering that the information be provided. The Court will consider Defendant's request for an adjournment of his sentencing as renewed once the declaration has been filed under seal or after October 1, 2020, and the Court will reconsider the application at that time. **SO ORDERED:**


HON. VERNON S. BRODERICK 9/16/2020
UNITED STATES DISTRICT JUDGE

I am writing to request an adjournment of the date of Mr. Ziskind's sentencing, which is currently scheduled for October 16, 2020, to a date in December or January that is convenient for the Court, in light of COVID-19 concerns, and concerns regarding the health of Mr. Ziskind's wife. I have communicated with Assistant United States Attorney Andrew Thomas. However, ASUA Thomas would like to proceed on the currently scheduled date.

Mr. Ziskind and I believe that his sentencing should be held at a time, where it can be done in-person, which may not happen by the currently scheduled date. Additionally, as is explained in the Pre-Sentencing Report produced by the United States Probation Department, Mr. Ziskind's wife, Ilona Shustef, has cancer. She is currently undergoing her second round of chemotherapy treatment. It is expected that this round of chemotherapy will conclude by November, at which time that she will proceed to surgery. Mr. Ziskind, understandably, wants to be present for his wife during the time that she has surgery, without having to make preparations for an imminent surrender, until the surgery is complete. At the time I last requested an adjournment, it did not appear that surgery would be required.

I am therefore requesting an adjournment of Mr. Ziskind's sentence until a December or January date that is convenient to the Court, to allow Mr. Ziskind to care for his wife during the next few months, and to increase the likelihood of an in-person sentencing.

Thank you for your attention to this matter.

Sincerely,

/s/

GARY M. KAUFMAN, ESQ.
Attorney for Vladimir Ziskind

cc: AUSA Robert Boone
AUSA Andrew Thomas